

ORIGINAL

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JOEL D. JOSEPH,

Plaintiff

v.

THE BUFFALO NEWS, INC.,

Defendant

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Case No.

16 - 1325

FILED  
CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2016 DEC 29 PM 3:31

**COMPLAINT FOR COPYRIGHT INFRINGEMENT**

**I. NATURE OF THE CASE**

1. This is a complaint for copyright infringement. Plaintiff wrote an article titled, "Manufacturing Tax of Zero," and registered it with the U.S. Copyright Office. The Buffalo News, Inc. published the article and has refused to pay any compensation to the plaintiff.

**II. JURISDICTION AND VENUE**

2. This is a civil action seeking damages for copyright infringement under the Copyright Act of the United States, 17 U.S.C. §101, et seq.

3. This Court has subject matter jurisdiction over this copyright infringement action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over Defendant since it is a Delaware corporation.

5. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b) and (c), and/or § 1400(a).

### **III. THE PARTIES**

6. Plaintiff is the author of the copyrighted work that is the subject of this case. He is a California resident.

7. The Buffalo News, Inc. is a Delaware corporation.

### **IV. FACTUAL ALLEGATIONS**

8. Plaintiff wrote an article entitled, “Manufacturing Tax of Zero” in January of 2015 and filed for and received a copyright registration on the article from the United States Copyright Office. A copy of the copyright registration is attached to this complaint as Exhibit A.

9. On September 13, 2015 The Buffalo News, Inc. published the article, “Manufacturing Tax of Zero.” A copy is attached to this complaint as Exhibit B.

10. Plaintiff asked defendant for compensation for publishing the article, but The Buffalo News, Inc. refused to pay anything to plaintiff.

### **V. CAUSE OF ACTION FOR COPYRIGHT INFRINGEMENT**

11. Plaintiff incorporates by reference paragraphs one through 10, inclusive.

12. Defendant has violated plaintiff’s copyright to the article “Manufacturing Tax of Zero.”

13. Defendant’s acts of infringement were willful, intentional and purposeful, in complete disregard of and with indifference to plaintiff’s rights.

14. Plaintiff is hereby seeking statutory damages in the amount of \$150,000 pursuant to 17 U.S.C. § 504(c).

15. Plaintiff further is entitled to his attorneys’ fees and full costs pursuant to 17 U.S.C. § 505 and otherwise according to law.

WHEREFORE, Plaintiff prays for judgment against Defendant as follows:

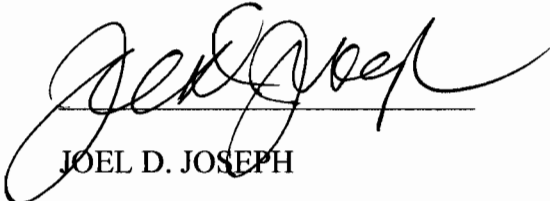
1. For statutory damages in the amount of \$150,000;
2. For attorneys' fees and costs; and
3. Such other relief as this court deems just and proper.



JOEL D. JOSEPH, PRO SE  
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**Jury Demand**

Plaintiff demands a trial by jury.



JOEL D. JOSEPH

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